

NEM:RMS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

RANDELL LICELOT PANIAGUA
DE ROSA,

Case No. 24-mj-00041

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

RAYMOND J. FRATTOLILLO, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about January 18, 2024, within the Eastern District of New York and elsewhere, the defendant RANDELL LICELOT PANIAGUA DE ROSA, together with others, did knowingly and intentionally import one or more controlled substances into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Section 952(a) and 960)

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”) and have been since 2019. I am currently assigned to the New York City Airport Border Enforcement Security Task Force Contraband Team I. During my time with HSI, I have been involved in the investigation of numerous cases involving drug trafficking and interdiction operations, including drug trafficking through airports. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and reports of other law enforcement officers involved in the investigation.

2. On or about January 18, 2024, the defendant RANDELL LICELOT PANIAGUA DE ROSA arrived at John F. Kennedy International Airport (“JFK”) in Queens, New York aboard Jet Blue flight B6310 from Santo Domingo, Dominican Republic.

3. During the screening process as part of the defendant’s entry into the United States, officers with the United States Customs and Border Protection (“CBP”) selected the defendant RANDELL LICELOT PANIAGUA DE ROSA for secondary screening. The defendant had in her possession 1 large blue suitcase and 1 duty-free bag. The defendant was asked whether the luggage and duty-free bag were hers and whether she had packed them herself, and she responded affirmatively.


4. Pursuant to border search authority, CBP officers examined the defendant’s luggage, including the bag from a duty-free store. The bag contained a total of three Johnnie Walker Island Green boxes, inside each of which was a vacuum-sealed silver package, as shown below.



5. Each of those sealed silver packages contained a white powdery substance. A field test of the white powder revealed the presence of cocaine, with an estimated weight of approximately 5.68 kilograms.

6. Following the recovery of the cocaine, United States Department of Homeland Security, Homeland Security Investigations placed the defendant RANDELL LICELOT PANIAGUA DE ROSA under arrest and provided her with Miranda warnings. The defendant agreed to speak with investigators and admitted, in sum and substance, she knew that it was wrong to bring in the silver packages into the United States and that she had done so in exchange for an expected payment of \$10,000.

WHEREFORE, your deponent respectfully requests that the defendant RANDELL
LICELOT PANIAGUA DE ROSA be dealt with according to law.



RAYMOND J. FRATTOLILLO

Special Agent

United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me telephonically
on January 19, 2024



THE HONORABLE MARCIA M. HENRY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK